

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**  
UNITED STATES OF AMERICA

v.

ROBERT MENENDEZ, NADINE  
MENENDEZ, WAEL HANA, JOSE URIBE,  
and FRED DAIBES,

Defendants.

Case No. 1:23-cr-490 (SHS)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the Declaration of Danny C. Onorato dated January 15, 2024<sup>1</sup>, and the accompanying Memorandum of Law, defendant Nadine Menendez, through her undersigned attorneys, will and hereby does respectfully move this Court before the Honorable Sidney H. Stein, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order severing Ms. Menendez' trial from defendant Senator Menendez.

January 15, 2024

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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*Counsel for Defendant Nadine Menendez*

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<sup>1</sup> The Declaration of Danny C. Onorato has been submitted *ex parte* and under seal because it reveals attorney work product and trial strategy in connection with Ms. Menendez's defense at trial.